

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (SMB) SIPA Liquidation (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	

**SUPPLEMENTAL DECLARATION OF VINEET SEHGAL IN SUPPORT OF THE
TRUSTEE'S RESPONSE TO THE MOTION FILED BY DEAN LOREN**

I, Vineet Sehgal, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a Managing Director at AlixPartners LLP ("AlixPartners"), a consultant to, and claims agent for, Irving H. Picard as trustee (the "Trustee") for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities ("BLMIS") and the estate of Bernard L. Madoff.

2. I submit this Supplemental Declaration in further support of the *Trustee's Response to the Motion Filed by Dean Loren* (ECF No. 17276) and to supplement the *Declaration of Vineet Sehgal in Support of the Trustee's Response to the Motion Filed by Dean Loren* (the "Sehgal Declaration" and collectively, the "Response") (ECF No. 17277).

3. As set forth in the Sehgal Declaration, on or about December 15, 2008, AlixPartners was retained by the Trustee as the Trustee's claims agent. As the Trustee's claims agent,

AlixPartners was responsible for both mailing the notice of the liquidation and claim forms to potential claimants and causing the notice of the liquidation to be published. AlixPartners has also been responsible for processing all claims submitted to the Trustee and assisting the Trustee in reviewing each customer claim filed to determine whether the asserted claim amount agrees with the “net equity” for that account. In addition, as the accountants for the BLMIS estate, AlixPartners has assisted and continues to assist the Trustee in accounting for the assets of the BLMIS estate, including the cash and cash equivalents available to the Trustee.

4. I have been actively involved in the liquidation of BLMIS and the claims process since December 2008 and have personal knowledge of the matters set forth herein.

5. On April 25, 2018, the Court conducted a hearing (the “Hearing”) on the Motion filed by Dean Loren (the “Motion”) (ECF No. 17160). At the Hearing and in his subsequent supplemental filing (ECF No. 17525), Mr. Loren made various allegations regarding Wolf Popper LLP (the “WP Firm”) and its purported relationship with BLMIS. Counsel to the Trustee represented to the Court that although the WP Firm was provided with notice of the procedures for filing claims with the Trustee, the WP Firm did not have an account with BLMIS.

6. In preparing the Response, AlixPartners and counsel to the Trustee had conducted a review of BLMIS’s books and records and had determined that the WP Firm did not have an account with BLMIS. Because the Motion was not clear on the extent the WP Firm was related to the allegations, the Response and Sehgal Declaration did not specifically address the extent to which the WP Firm appeared in the BLMIS books and records.

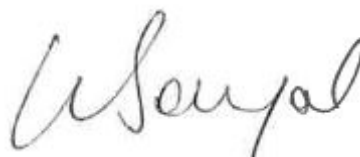
7. Based on my review of the books and records of BLMIS, the WP Firm did not have an account with BLMIS. The WP Firm was listed in the BLMIS books and records because an

employee of the WP Firm, Marian Rosner, opened a personal account with BLMIS.¹ BLMIS's books and records reflect that Ms. Rosner used the WP Firm's address for BLMIS account notices.

8. There is no indication from BLMIS's books and records that Ms. Rosner had any connections to Dean Loren, Evelyn Goldberg, Simon Goldberg, or Emily Madoff (other than the fact that Ms. Rosner and Emily Madoff each worked at the WP Firm). There is no indication that Emily Madoff, a name mentioned in the Motion, had any interest or connection to the BLMIS account. The WP Firm did not file a customer claim with the Trustee.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
May 22, 2018



Vineet Sehgal,
Managing Director
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¹ The schedule of claimants to whom AlixPartners mailed notice of the procedures for filing claims with the Trustee incorrectly identifies Ms. Rosner as Marian Popper. *See* Sehgal Declaration, Ex. B (ECF No. 76-1 at 87, 163).